

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SUZANNE GREENE,

Plaintiff,

vs.

TYLER TECHNOLOGIES, INC.,

Defendant.

Civil Action No. 1:19-cv-01338-AT

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE CONSOLIDATED JOINT DISCOVERY STATEMENT**

Plaintiff Suzanne Greene requests that the time in which the parties may file their Consolidated Joint Discovery Statement be extended through and including Friday, October 18, 2019, and in support thereof, show the Court as follows:

1. During a Telephone Conference held on October 8, 2019, Judge Totenberg permitted Plaintiff to renew her request to depose Defendant's counsel, Paulo McKeeby, after deposing Defendant's 30(b)(6) representative on the factual basis of its good faith defense.
2. Plaintiff conducted the 30(b)(6) deposition of Defendant on October 9, 2019, and now wishes to file a renewed request for leave to depose Mr. McKeeby.

3. Plaintiff also has a number of outstanding discovery disputes to bring to the Court for resolution in connection with Defendants' document production and interrogatory responses.
4. Plaintiff provided defense counsel with a draft of her contributions to a consolidated joint discovery statement on Monday, October 14, 2019.
5. Defense counsel has informed Plaintiff's counsel that he is currently traveling and is unable to provide Defendant's contributions until Thursday, October 17, 2019.
6. Discovery is currently scheduled to end tomorrow, Wednesday, October 16, 2019.
7. Plaintiff is concerned that by delaying the filing of the joint discovery statement until after the close of discovery, she may waive her right to compel the additional discovery sought.
8. Plaintiff therefore requests a two-day extension to file joint discovery statement, through and including Friday, October 18, 2019.
9. Defendant does not oppose this request.
10. This request for extension is not being made for the purpose of delay, nor will the relief requested prejudice any party.
11. A proposed order is attached for the Court's convenience.

12. Pursuant to LR 7.1, NDGa, the undersigned counsel certify that this motion was prepared using Times New Roman 14-point font, one of the font and point selections approved by the Court in LR 5.1, NDGa.

WHEREFORE, Plaintiff respectfully requests that the Court grant a two-day extension of time to file the Parties' Consolidated Joint Discovery Statement through and including Friday, October 18, 2019.

This 15th day of October 2019,

Respectfully submitted,

**DELONG, CALDWELL, BRIDGERS,
FITZPATRICK & BENJAMIN, LLC**

/s/ Matthew W. Herrington

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Counsel for Plaintiff

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed with the Clerk via the Court's CM/ECF system, which will automatically effect service upon all counsel of record.

Dated: October 15, 2019

/s/ Matthew W. Herrington
Matthew W. Herrington
Georgia Bar No. 275411